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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JACK DIEP, individually; JORY LEVY,
individually; JAMES DAYAP, individually;
MARVIN CUTCHINS; and RAY
CHARLES, JR.,

Plaintiffs,

v.

LIBERTY MEDIA CORPORATION d/b/a
FORMULA ONE HEINEKEN SILVER LAS
VEGAS GRAND PRIX, a foreign
corporation; LAS VEGAS PAVING
CORPORATION, a Nevada corporation;
DOE INDIVIDUALS 1-20, inclusive; and
ROE CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:23-cv-02124-GMN-NJK

**STIPULATION AND ORDER TO
MODIFY BRIEFING SCHEDULE
FOR DEFENDANTS' MOTIONS TO
DISMISS PLAINTIFFS'
CONSOLIDATED CLASS ACTION
COMPLAINT**

(First Request)

1 Pursuant to Local Rule IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for
2 Plaintiffs, Defendant Liberty Media Corporation (“Liberty”), and Defendant Las Vegas Paving
3 Corporation (“Las Vegas Paving”) (collectively the “Defendants”) hereby STIPULATE to
4 extend the time for Plaintiffs to file their Opposition to Defendants’ respective motions to
5 dismiss Plaintiffs’ Consolidated Class Action Complaint and for Defendants to file their
6 Replies by fourteen days as explained below. Per LR 7-2(b), Plaintiffs’ Oppositions to
7 Defendants’ Motions are currently due June 21, 2024, and Defendants’ Reply briefs are due
8 June 28, 2024.

9 On May 24, 2024, Plaintiffs filed their Consolidated Class Action Complaint. ECF No.
10 37. On June 7, 2024, Defendants timely filed their respective motions to dismiss. ECF Nos.
11 38, 39. The parties STIPULATE that the new deadline for Plaintiffs to file their Opposition
12 shall be **July 5, 2024**. The parties further STIPULATE that the new deadline for Defendants
13 to file their respective Replies shall be **July 26, 2024**.

14 The reason for the requested extension is that Plaintiffs’ counsel is travelling cross-
15 country for an in-person hearing for another matter in the Eastern District of New York on
16 June 18, 2024. This hearing is in the middle of the two-week period Plaintiffs have to oppose
17 Defendants’ motions under the local rules. *See* LR 7-2(b). Moreover, Plaintiffs’ counsel submit
18 that Defendants’ motions raise several issues that require in-depth analysis and Plaintiffs
19 require additional time to properly oppose. Similarly, the parties agree that twenty-one days
20 (rather than seven days allowed under the LR 7-2(b)) allows sufficient time for Defendants to
21 properly reply to Plaintiffs’ intended opposition.

22 This is the first stipulation to extend the subject deadlines. The parties submit that the
23 request is made in good faith and not for purposes of delay.

1 DATED: June 14, 2024

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Respectfully submitted,

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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: June 17, 2024

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2024, I caused the foregoing document to be served upon counsel of record via electronic mail.

DATED: June 14, 2024

/s/ Steve W. Berman
Steve W. Berman